

United States Bankruptcy Court
Northern District of Illinois, Eastern Division

IN RE: Marie A. Watkins)	Chapter 13
)	Case No. 15 B 31422
Debtor(s))	Judge Deborah L. Thorne

Notice of Motion

Marie A. Watkins
824 E. 44th Street, Apt. #2
Chicago, IL 60653

Debtor Attorney: Ledford Wu & Borges LLC
via Clerk's ECF noticing procedures

On November 30, 2015 at 10:30 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 613
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, November 20, 2015.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 09/15/2015.
2. The debtor(s) have failed to begin payments within thirty days of filing the plan as required under 11 U.S.C. §1326(a) (1).
3. The debtor(s) have failed to resolve the pending objection(s) to the plan.
4. The debtor(s) have failed to commit all disposable income to the plan.
5. The debtor(s) have failed to amend schedule G to list landlord.
6. The Debtor has failed to list other names used on her Voluntary Petition.
7. The Debtor has failed to amend schedule E to list tax liability.
8. The Debtor has failed to amend schedule I to accurately list income.
9. The Debtor has failed to amend schedule J to accurately list expenses.
10. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE